

February 26, 2013

The Honorable Andy Harris
Chairman
Subcommittee on Environment
Committee on Science, Space and Technology
U.S. House of Representatives

The Honorable Suzanne Bonamici
Ranking Member
Subcommittee on Environment
Committee on Science, Space and Technology
U.S. House of Representatives

Dear Chairman Harris and Ranking Member Bonamici:

On behalf of the 600 members of the American Coalition for Ethanol (ACE), I am writing to explain our deep concern with the ongoing misrepresentation of testing by the Coordinated Research Council (CRC) on E15 because it appears the Subcommittee will rely heavily upon this flawed study in today's hearing.

Founded in 1987, ACE is the grassroots voice of the U.S. ethanol industry, uniting ethanol producers, farmers, agriculture and commodity groups, cellulosic and advanced biofuel companies, rural electric cooperatives, and grassroots individuals in support of our mission to make American ethanol the consumer fuel of choice. More information about ACE can be found at our website, www.ethanol.org.

Since no representatives of the ethanol industry were invited to participate in today's hearing, we are skeptical that its reported goal - to examine the scientific, technical and consumer impacts of EPA's approval of E15, and the impact of E15 on car engines and fuel infrastructure – is a goal that can be achieved. Our skepticism for a fair hearing is obvious when the only scheduled witnesses are a representative of the American Motorcyclist Association; an industry that is forbidden by law from using E15, CRC; formed and funded by the oil industry and the author of the severely flawed study in question regarding E15 and car engines, and AAA; which has abandoned its reputation as an advocate for motorists to instead widely misrepresent the results of the CRC study.

Of major concern to our industry is "CRC Project Number CM-136-09-1- Engine Durability Study of Intermediate Ethanol Blends," and the ongoing distortion of that study's results in the media and before Congress. ACE and many others have been vocal critics of the very biased CRC study. In fact, so many have criticized this test that [CRC felt compelled to write an open letter defending its integrity and test methods](#). We were hopeful that the media or elected officials would look further into the details of the study and see the same irregularities that we have seen. Unfortunately, there appears to be little interest in discussing of the actual details of the CRC study.

Certainly, members of the Science and Technology Committee understand, better than most other elected officials, that for a study to be considered statistically sound, it must test a representative sample that is sufficiently large, and it must make every effort to minimize the bias of that sample. On those basic of requirements for scientific accuracy, CRC Project CM-136-09-1 fails miserably.

In earlier E15 and mid-level ethanol blends testing, CRC selected vehicles from among the most popular in the U.S., and in most of those tests, the results were favorable for E15. CRC Project CM-136-09-1 takes a very different approach, choosing vehicles that represent a tiny sliver of the vehicle fleet that has been approved to use E15, and assuring that the chosen sliver is comprised of vehicles with engines that have a high likelihood of failure regardless of fuel.

Even though E15 was tested by the U.S. Department of Energy and approved by EPA for 2001 and newer vehicles after a public comment period in which no data proving problems associated with E15 in passenger vehicles was presented, the oil industry is now pushing for legislation that would deny consumer access to it. Oil companies are making their case by misrepresenting the results of the CRC study, which tests an eight vehicle sample, only one of which was among the top 10 vehicles sold in the U.S. since 2001 ([chart](#)). The American Petroleum Institute (API) and other ethanol opponents continually refer to “millions of vehicles at risk,” yet the eight vehicles represent less than one million of the 180 million cars and light trucks sold in the U.S. in model years 2001 and later. In fact, U.S. sales of the vehicle models used in CRC Project CM-136-09-1 make up about one-half of one percent of the total vehicle pool approved to use E15.

Such a non-representative sample should raise a red flag in the science and technology community, yet CRC and the oil industry have been practically unchallenged in their characterization of CRC Project CM-136-09-1 as a test that is representative of the vehicle fleet in general. To the contrary, [the February 18, 2009 request for proposal \(RFP\) for the CRC study states clearly that the objective of the test is to determine durability on engines that “are deemed to be sensitive to the effects of E20.”](#)

That is the reason the vehicles were selected. The 2001 Honda CR-V, 2002 VW Jetta, 2004 Scion xA, 2005 Chevrolet Colorado, 2007 Ford Edge, 2007 Dodge Ram, 2009 Dodge Caliber, and 2009 Chevrolet Aveo, were selected for CRC Project CM-136-09-1 because they already had a history of the type of failure the test purported to be looking for regardless of the fuel it was using. As such, it is inaccurate to say those engines were “sensitive to the effects of E20” or E15. Over 300 Technical Service Bulletins (TSB) were issued by the manufacturers of the eight CRC-tested vehicles, [and many of those bulletins described problems that would cause the vehicle to “fail” in the CRC test](#). TSBs are not issued for isolated problems – they are issued for problems that service technicians are likely to see frequently.

Rather than test the much better-selling Honda Accord or Civic, CRC chose the 2001 Honda CR-V. Six TSBs dating back to April of 2002, show a history of rough idle, hard starting, poor engine performance, malfunction indicator lamps, evaporative emissions system issues, coolant in the oil pan, and internal leaks in the 2002 CR-V – all which have been happening long before the introduction of E15.

The Toyota Camry is usually the top selling car in the U.S., and Corolla is not far behind. CRC decided to instead test the Scion xA, with its TSB on fuel injectors that clogged without ever using E15. Since we don’t know which vehicles are which in the CRC test, we don’t know if E20 or E15, in fact, cleared the blockage. But we do know that none of the CRC-tested engines had fuel injector problems.

Volkswagen issued TSBs on the 2002 Jetta for fuel system diagnostic trouble codes, problems with rich and lean fuel mixtures, rough idle, significant loss of power or stalling with reduced performance. The Chevrolet Aveo had a TSB issued regarding reduced power and a check engine light.

Half of the vehicles purchased in the U.S. are light trucks, and the Ford F150 and Chevy Silverado have been the two top selling vehicles for many years. So why would CRC choose the 2005 Chevrolet Colorado for Project CM-136-09-1 instead? Perhaps because the Colorado had a history of problems with valves, valve seats, combustion

leakage, bad trouble codes, and reduced power. In fact twenty TSBs were issued on the Chevy Colorado for problems that would fail the CRC Project CM-136-09-1 tests, and General Motors took the unusual step of sending a letter to every Colorado owner telling them that the engine intake valve seats may wear, which “will cause partial misfire and illumination of the service engine soon light. Continued operation and resulting additional wear may eventually lead to engine idle roughness.” Chevy even extended its warranty on the Colorado to 7 years and 100,000 miles to assure that the problem was repaired if it happened later in the life of the car.

All of the problems listed in the preceding paragraphs were among the list of reasons that an engine would be deemed “failed” in the special standards CRC created specifically for this test.

The history problems with these engines happened regardless of fuel, long before E15 or E20 existed. In addition to the selection of the vehicles, the [RFP](#) for CRC Project CM-136-09-1 clearly points out that the CRC test itself is designed to induce the problems it eventually found. “The cycle was developed based on fuel induced valve seat recession and control affects on engine durability.” It also says “The test procedure calls for accelerated testing to reduce test time and reveal possible failures...the severity helps reduce test time...”

Given this critical background and perspective, it is clear that either CRC selected the vehicles and the test protocol because they knew there was a high likelihood of failure regardless of fuel, and that is the result they wanted, or, they had no idea that the vehicles selected had these issues. The latter would indicate a stunning lack of due diligence in the preparation for the test. Clearly, the objective was to shift blame for historical failure to a new fuel, and that objective is in writing.

It is curious, then, why CRC refuses to make that point clear when API continues to misrepresent the study as a mainstream indicator of widespread E15 destruction? The CRC test merely indicates that some engines that already had problems will continue to have problems, regardless of fuel.

What Congress needs to investigate is why the oil companies are misleading it into eliminating their only real competition, and why this contrived CRC research is not being more fully analyzed. Prior to the CRC test, the U.S. Energy Department conducted its own rigorous peer-reviewed tests on E15 which EPA relied upon in approving the fuel. Why does the Subcommittee not seem interested in the perspective of the Energy Department on E15?

The E15 debate is not about fuel quality. Porsche approves the use E15 in 2001 and newer cars. The companies who make lawnmowers don’t approve it. Some engines just are not of sufficient quality to handle today’s fuels. E15 has been thoroughly tested, including several successful tests by CRC, as a safe fuel for approved vehicles and engines. We appreciate your consideration and trust the science behind E15 will receive a full and fair hearing at some point in the near future. ACE stands ready to provide any information needed to help this Subcommittee make its decision based on science rather than public relations campaigns and rhetoric.

Sincerely,



Ron Lamberty, Senior Vice President
American Coalition for Ethanol (ACE)